

May 13, 2013

VIA ELECTRONIC DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Room TWA325
Washington, DC 20554

**Re: Notice of *Ex Parte* Presentations
WT Docket No. 12-69**

Dear Ms. Dortch:

On May 9, 2013, Scott Wills, Paul Kolodzy, and I, representing Vulcan Wireless LLC ("Vulcan"), and Trey Hanbury and Doug Hyslop (by telephone), representing the Competitive Carriers Association ("CCA"), met with Louis Peraertz, Legal Advisor to Commissioner Clyburn, to discuss issues related to the above-captioned proceeding. In addition, Scott Wills, Paul Kolodzy and I participated on a brief conference call with Louis Peraertz on May 10 to clarify the material presented below.

During the meetings, the parties discussed whether consumers would experience harmful interference if the Commission were to require 700 MHz B and C Block licensees to grant their customers the freedom to roam and interoperate with license holders in the 700 MHz A Block. The parties also responded to questions about the related technical discussions raised during the course of the FCC's recent 600 MHz band plan workshop on May 3, 2013.

Specifically, Msrs. Kolodzy and Hyslop addressed opposing views which attempt to portray Lower 700 MHz E Block mobile broadcast transmissions as harmful to other lower 700 MHz licensees. These unsubstantiated arguments assert that the Lower E Block transmissions could present a strong interfering signal at the antenna of a device operating in the Lower B and C Blocks that could cause receiver blocking. The Hyslop-Kolodzy Test Report was designed to evaluate these claims of interference, and it refutes these claims with both laboratory and field measurements.¹ Testing showed that both: (1) the actual signal strengths received by the devices are not strong enough to cause harmful interference, and (2) the actual device

¹ *Lower 700 MHz Test Report: Laboratory and Field Testing of LTE Performance near Lower E Block and Channel 51 Broadcast Stations* (Apr. 11, 2012) (attached to Notice of *Ex Parte* Presentations by Cavalier Wireless, C Spire Wireless, Continuum 700 LLC, King Street Wireless, L.P., Metro PCS Communications, Inc., U.S. Cellular, and Vulcan Wireless; WT Docket No. 12-69 (May 29, 2012).

performance far exceeds the minimum specifications found in the LTE standard. Indeed, there is a greater risk of a strong interfering signal into the Lower 700 MHz B Block from either the 700 MHz Upper C Block or the 700 MHz Lower C Block than from the 700 MHz Lower E Block, for the reasons set forth below.

The mobile broadcast systems licensed and deployed on the Lower 700 MHz E Block rely on high-power, high-site transmissions that propel the bulk of radiofrequency energy toward the horizon, not the ground surrounding the antenna site. Unlike low-power, low-site cellularized LTE networks, mobile broadcasters seek to provide the largest possible coverage area with a reliable signal and reduce the number of transmission towers necessary to cover their market. By comparison, the cellular signals, such as those emanating from the Upper C Block or the Lower C Block, originate from lower cellular tower network architectures (10 meters to 30 meters, in general) and usually include an antenna gain and down-tilt to focus signal strength on the ground surrounding the tower for optimum two-way communications. These basic differences in network system configuration help account for some of the differences between theoretical interference projections and actual interference results. In this case, moreover, all base station transmitters for the lower and upper 700 MHz bands have a power flux density limit (power measured at the ground level) of 3000 microwatts per square meter within 1 km of the transmitter. Therefore, even if a high-power, high-site broadcast operation wished to use lower towers or down-tilt the beam, the 700 MHz limits would prevent an E Block antenna from being configured to produce signals powerful enough to generate harmful interference (and these signals would be no greater than those from neighboring LTE deployed networks, which also have the same limit of 3000 microwatts per square meter within 1 km of the transmitter).

Furthermore, the Hyslop-Kolodzy Test Report also conducted field measurement testing of power levels from Upper C Block LTE tower deployments that were adjacent to the Lower 700 MHz band. This field testing showed that Upper C Block LTE towers delivered higher power levels on the ground than the Lower 700 MHz E Block network deployment delivered. This demonstrates that devices operating on networks deployed on the Lower 700 MHz B and C Blocks are capable of handling Lower E Block emissions, as they have been handling neighboring LTE emissions with greater signal strength.

Pursuant to Section 1.206(b) of the Commission's rules, I am filing this notice electronically in the above-referenced docket. Please contact me directly with any questions.

Respectfully submitted

/s/ Michele C. Farquhar

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cc: Louis Peraertz